

12377 Merit Drive Suite 1700  
Dallas, TX 75251

February 28, 2000

Office of General Counsel  
Federal Election Commission  
Washington, DC 20463

Re: MUR 4968

Dear Sirs:

My name is Russell J. Verney. I reside in Collin County at 6812 Summer Meadow Lane, Dallas, TX 75252. My business mailing address is 12377 Merit Drive, Suite 1700, Dallas, TX 75251. My office phone number is

I served as national coordinator of Perot '96 and am the former national chairman of the Reform Party. This letter is in response to MUR 4968.

The complaint states the assertions in the complaint are “suspicions and assumptions.”

It states that Perot '96 maintained a compliance staff after the election and audit, through February 28, 1999. That is correct.

Accusations are made that employees of Perot '96 volunteered personal time to the Reform Party. That is likely true as to some of the employees. As the supervisor of the Perot '96 wind-down staff, I can attest that there were no limits placed on the personal time of employees.

In exhibits complainants ask several questions. Please be advised as follows: the Reform Party was invited to join in a lawsuit as a plaintiff and no expense was incurred; as discussed with the FEC on-site auditors, there were phone lines in the Perot '96 wind-down office which were not paid for by Perot '96 which were available to the staff for calls unrelated to Perot '96 wind-down activities (such as seeking employment opportunities).

MUR 4968 does not state a claim for violation of FECA. The couple filing the complaint has personal enmity towards me. An exercise of personal animus does not warrant the use of Commission resources.

Submitted under oath.

Respectfully,

**Russell J. Verney**